

REED SMITH LLP
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REED SMITH LLP
Timothy P. Law, Esq. (admitted *pro hac vice*)
1717 Arch Street
Three Logan Square, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Facsimile: (215) 851-1420
E-mail: tlaw@reedsmith.com

*Special Insurance Counsel for Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,¹

Debtor.

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Chapter 11

Case No. 20-12345 (MG)

**THIRTY-FIFTH MONTHLY STATEMENT OF REED SMITH LLP, AS
SPECIAL INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION,
OF FEES FOR PROFESSIONAL SERVICES RENDERED AND
DISBURSEMENTS INCURRED FOR THE PERIOD
AUGUST 1, 2023 THROUGH AUGUST 31, 2023**

Name of Applicant:	Reed Smith LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Order entered on November 4, 2020, <i>nunc pro tunc</i> to October 1, 2020
Period for which compensation and reimbursement is sought:	August 1, 2023 to August 31, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$256,962.50 80% of which is \$205,570.00

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$1,561.89
Fees and Expenses of Debtor's Consulting Expert ("Expert F&E")	\$23,083.25 ²
TOTAL (80% of fees, 100% of costs, 100% of Expert F&E)	\$230,215.14

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this thirty-fifth monthly statement (the "Monthly Statement") for the period of August 1, 2023 through August 31, 2023 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$205,570.00 (80% of \$256,962.50) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith, (b) reimbursement of actual and necessary costs and expenses in the amount of \$1,561.89 incurred by Reed Smith during the Statement Period, and (c) reimbursement for services rendered, and costs and expenses incurred, by Debtor's consulting expert in the amount of \$23,083.25.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

² Submitted for payment pursuant to *Order Authorizing the Retention of Experts* [Dkt. No. 783], ¶ 3.

Name	Title	Department	Office	JD Year	Rate	Hours	Amount
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	1,250	43.1	\$53,875.00
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	625	4.0	\$2,500.00
Javian, Aaron	Fix.Sh.Partner	Business and Finance	New York	2004	1,215	0.5	\$607.50
Kramer, Ann	Fix.Sh.Partner	Litigation	New York	1984	1,390	217	\$30,163.00
Berringer, John	Counsel	Litigation	New York	1980	1,285	47.0	\$60,395.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	685	92.4	\$63,294.00
LauKamg, Christopher	Paralegal	Business and Finance	New York	-	410	28.2	\$1,562.00
Simmonds, Lianna E.	Paralegal	Litigation	Philadelphia	-	330	2.2	\$726.00
Schad, James	Other	Litigation	Washington	-	600	56.4	\$33,840.00
						295.5	\$ 256,962.50
TOTAL:						295.5	\$ 256,962.50

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

Description	Amount
T. Law Rail Expense to Attend W. Chapin Deposition and Settlement Conference	\$311.00
T. Law Lodging Expense to Attend W. Chapin Deposition and Settlement Conference	\$231.99
Amended and Supplemental Petition for Writ of Mandamus Filing Expense	\$150.00
Gravity Stack LLC May 2023 Invoice	\$868.90
Total:	\$1,561.89

NOTICE AND OBJECTION PROCEDURES

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than **October 6, 2023** (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v)

Special Insurance Counsel, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 80% of the fees and 100% of the expenses identified in the Monthly Statement as well as 100% of the Expert F&E.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: September 21, 2023
New York, New York

REED SMITH LLP

/s/ Aaron Javian
Aaron Javian, Esq.
John B. Berringer, Esq.
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New York, NY 10022
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Facsimile: (212) 521-5450
E-mail: ajavian@reedsmith.com
E-mail: jberringer@reedsmith.com

-and-

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EXHIBIT A



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
Tax ID # 25-0749630

ABU DHABI ♦ ATHENS ♦ AUSTIN ♦ BEIJING ♦ BRUSSELS ♦ CENTURY CITY ♦ CHICAGO ♦ DALLAS ♦ DUBAI ♦ FRANKFURT ♦ HONG KONG ♦ HOUSTON ♦ KAZAKHSTAN ♦ LONDON ♦ LOS ANGELES ♦ MIAMI
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3653093**
Invoice Date: **9/20/2023**
Client Number: **504893**
Matter Number: **504893.20001**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Non-Working Travel

Total Current Fees.....\$ 2,500.00

Total Due This Invoice: \$ 2,500.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Client Number: **504893**
Matter Number: **504893.20001**

RE: Non-Working Travel

INVOICE SUMMARY

Total Current Fees.....	\$ 2,500.00
Total Due This Invoice:	\$ <u>2,500.00</u>

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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50 No. Park Avenue
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Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3653093**
Invoice Date: **9/20/2023**
Client Number: **504893**
Matter Number: **504893.20001**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2023

Date	Timekeeper	Description	Hours
08/01/23	T.P. Law	Travel to NYC for Chapin deposition and settlement conference with Magistrate Judge Cave.	2.00
08/04/23	T.P. Law	Return to Philadelphia from Chapin deposition and settlement conference with Magistrate Judge Cave.	2.00
Total Hours			4.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Timothy P. Law	4.00 hrs @ \$	625.00 / hr	2,500.00
Total Professional Services			2,500.00

INVOICE SUMMARY

Total Fees \$ 2,500.00

TOTAL CURRENT INVOICE DUE \$ **2,500.00**

Total Amount Due \$ **2,500.00**



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Suite 3100
1717 Arch Street
Philadelphia, PA 19103
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Invoice Number: **3653092**
Invoice Date: **9/20/2023**
Client Number: **504893**
Matter Number: **504893.60005**

REMITTANCE PAGE
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RE: Chapter 11 Insurance Recovery

Total Current Fees.....	\$	249,837.00
Total Current Expenses and Other Charges	\$	1,561.89
Total Due This Invoice:	\$	<u>251,398.89</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
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Account #2-022-986
(Please Reference Invoice Number)



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Total Current Expenses and Other Charges	\$ 1,561.89
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Client Number: **504893**
Matter Number: **504893.60005**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2023

Date	Timekeeper	Description	Hours
08/01/23	J.B. Berringer	Preparation for, attendance on team conf. call (1.30); revisions to discovery demands (.80); review new GB docs, emails Schad, Kim, Chapin re: same (1.80); prep for Chapin dep, o/c T. Law re: same (1.10); revision to 30(b)(6) Outline (.50).	5.50
08/01/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.20
08/01/23	J.C. Schad	Prepare report to J. Berringer re: insurer letter, prior correspondence (1.1); Transmit materials to E. Kim re: deposition outline (1.5).	2.60
08/01/23	E. Y. Kim	Call with J. Schad to update 30(b)(6) outline regarding document collection (.90); call with T. Law and J. Berringer regarding W. Chapin deposition preparation (.40); analyze case relating to 30(b)(6) depositions cited by Judge Cave per T. Law's request (.30); revise 30(b)(6) deposition outline regarding the Diocese's search and production of documents (1.50).	3.10
08/01/23	A. Kramer	Draft note to client, JD and RS teams re call with Sugayan re: mediation (.30); analysis re: Allianz/Interstate re: mediation (.80); discuss MJCave order in Arrowood case with Berringer (.10); draft insurance settlement recommendation (1.20).	2.40
08/01/23	T.P. Law	Deposition preparation with B. Chapin.	4.00
08/01/23	T.P. Law	Review deposition transcript and draft corrections	1.20



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Date	Timekeeper	Description	Hours
		to B. Chapin's deposition testimony.	
08/02/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/02/23	J.C. Schad	Attention to historic claim handling procedures (.70); review, notate, record revisions to 30(b)(6) Outline (.50); review insurer letter for response to W. Chapin re: request for high level excess insurer information (.60).	1.80
08/02/23	J.B. Berringer	Preparation for and attendance at session with W. Chapin (4.80); review mediation order (.90); revisions to 30(b)(6) Outline (.80); follow-up re: Arrowood letters (.60).	7.10
08/02/23	E. Y. Kim	Revise supplemental 30(b)(6) outline for W. Chapin deposition regarding document collection and productions (2.3); analyze documents relating to the Diocese's claims to Arrowood and finalize supplemental production of same (3.3).	5.60
08/02/23	A. Kramer	Work in Process call with client, JD, RS and A&M teams re: settlement negotiations (1.0); telephone call with S. Minarovich re: mediation (.20); draft note to C. Ball re: mediation issues (.20).	1.40
08/02/23	T.P. Law	Participate in work in process call with Jones Day and Reed Smith teams.	1.20
08/02/23	T.P. Law	Draft revised corrections to B. Chapin deposition.	0.70
08/03/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/03/23	T.P. Law	Defend B. Chapin deposition.	4.20
08/03/23	T.P. Law	Prepare for B. Chapin deposition.	1.20
08/04/23	A. Kramer	Telephone call and email exchange with J. Berringer re: mediation session (.30); email exchange with S. Minarovich re: mediation (.10).	0.40



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Date	Timekeeper	Description	Hours
08/04/23	T.P. Law	Attend settlement conference with P. Osselaer and Magistrate Judge Cave.	4.20
08/04/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
08/04/23	J.B. Berringer	Preparation for and attendance at mediation.	4.50
08/07/23	J.B. Berringer	Memo to A. Kramer re: mediation session.	0.60
08/07/23	T.P. Law	Email exchange with E. Kim re: Evanston and LMI discovery responses.	0.30
08/07/23	T.P. Law	Review court order re: assignment of new judge in LMI action and email opposing counsel re: necessary next steps.	0.30
08/07/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
08/07/23	T.P. Law	Review and comment on motion to further amend the bar date order re: Arrowood issues.	0.80
08/07/23	A. Kramer	Draft note to S. Minarovich (Allianz) re: mediation.	0.20
08/08/23	E. Y. Kim	Analyze LMI policies and documents relating to claims brought under the LMI policies to draft responses to LMI Phase I interrogatories (3.5); emails to J. Schad regarding same (.30).	3.80
08/08/23	J.C. Schad	Prepare, discuss discovery responses with E. Kim (.50); research, analyze, prepare detailed reports to E. Kim re: suits alleging injury during the pre-1986 LMI coverage (3.2); research, extract, prepare schedule of policies in certain tower of coverage for report to E. Kim (.60).	4.30
08/08/23	J.B. Berringer	Review of letters from LMI.	1.00
08/08/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80



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Date	Timekeeper	Description	Hours
08/08/23	T.P. Law	Meet with E. Kim and review emails re: Evanston and LMI discovery responses.	0.30
08/08/23	A. Kramer	Communications with T. Law and KCIC re: claim lists (.20); telephone conversation and email exchange with S. Minarovich re: mediation (.30).	0.50
08/09/23	E. Y. Kim	Call with J. Schad re: LMI and Evanston policies and document requests (.50); call with W. Chapin, J. Berringer, T. Law, Network Adjusters, Porter & Curtis regarding same (.80); analyze the Diocese and Gallagher Bassett documents responsive to LMI's document requests for production (3.1).	4.40
08/09/23	T.P. Law	Work in progress call with Reed Smith and Jones Day teams.	0.80
08/09/23	J.C. Schad	Prepare materials requested during discussion with E. Kim re: LMI discovery.	0.60
08/09/23	J.B. Berringer	Team teleconference (.70); teleconference with E. Kim re: discovery responses (.80); review and reply to email re: NY Liquidation Bureau (.60); review draft of letter to Judge Cave (.50); review emails re: Arrowood discovery (.60).	3.20
08/09/23	J.B. Berringer	Analyze LMI policies and documents relating to claims brought under the LMI policies to draft responses to LMI Phase 1 interrogatories (3.5); emails to J. Schad regarding same (.30); review of letters from LMI (1.0).	4.80
08/09/23	T.P. Law	Draft revisions to joint letter to Magistrate Judge Dave drafted by Arrowood's counsel.	0.30
08/09/23	T.P. Law	Email Arrowood re: failure to respond to the Diocese's interrogatories and document requests.	0.40
08/09/23	A. Kramer	Work in process call with JD and RS Teams re: Arrowood discovery, insurer negotiations etc. (.80); email exchange with KCIC re claim lists (.20); review Arrowood response re: meetings with plaintiffs (.10); email exchange with T. Law re: same (.10); email exchange with S. Minarovich re: mediation issue (.30).	1.50



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Date	Timekeeper	Description	Hours
08/09/23	T.P. Law	Forward Gallagher Bassett service agreements.	0.40
08/09/23	T.P. Law	Email and telephone conference with E. Stephens re: response to LMI and Evanston discovery responses.	0.80
08/09/23	T.P. Law	Telephone conference with Diocese, Porter & Curtis, and Network Adjusters re: response to LMI and Evanston discovery responses.	0.80
08/10/23	E. Y. Kim	Analyze documents from Network Adjusters regarding claim correspondence and course of dealing documents for production to LMI (3.1); call with E. Stephens, T. Law regarding discovery responses to LMI and Evanston (.30); draft, revise responses to LMI interrogatories (2.5).	5.90
08/10/23	J.B. Berringer	Telephone conference with C. Adams re: Placa deposition.	0.40
08/10/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
08/10/23	J.C. Schad	Prepare file materials pertinent to LMI program policies for E. Kim review for potential production in discovery.	2.40
08/10/23	J.B. Berringer	Emails re: NY Liquidation Bureau (.30); review emails re: discovery responses (.50); review draft letters to Judge Cave (.60); review A. Smith letter re: 30(b)(6) (.60).	2.00
08/10/23	T.P. Law	Repeated emails to Arrowood's counsel re: joint letter.	2.20
08/10/23	T.P. Law	Emails with Jones Day and parish counsel re: NY property and casualty security fund per claim limits.	0.30
08/10/23	T.P. Law	Telephone conference with E. Stephens of Jones Day re: discovery responses to LMI and Evanston.	0.40
08/10/23	T.P. Law	Meet with E. Kim re: discovery responses to LMI and Evanston and forward materials.	0.30



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Date	Timekeeper	Description	Hours
08/11/23	E. Y. Kim	Analyze documents from Network Adjusters regarding claim documents and LMI policy-related documents for production to LMI (4.3); calls with J. Schad regarding same (.30); draft, revise responses to LMI interrogatories (1.2).	5.80
08/11/23	L. E. Simmonds	Research corporate address for Gallagher Bassett Services, Inc., Marsh USA, and Network Adjusters.	0.70
08/11/23	J.C. Schad	Collect materials potentially responsive to discovery requests for reports to E. Kim re: LMI (3.6); analyze, collect materials potentially responsive to discovery requests for reports to E. Kim re: Evanston (.80); prepare, transmit materials for preparation, production LMI (1.2); analyze, prepare report re: materials received from broker (.70).	6.30
08/11/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/12/23	E. Y. Kim	Analyze claim documents and Gallagher Bassett agreements from client for production to LMI.	3.60
08/12/23	J.C. Schad	Analyze, collect materials potentially responsive to discovery requests for reports to E. Kim re: LMI.	3.40
08/13/23	J.C. Schad	Analyze, collect materials potentially responsive to discovery requests for reports to E. Kim re: LMI.	2.30
08/14/23	E. Y. Kim	Calls with J. Schad regarding documents relating to LMI from Network Adjusters and Porter & Curtis (1.1); analyze documents from client, Network Adjusters and Porter & Curtis for production to LMI (4.2); revise responses to LMI interrogatories (1.5).	6.80
08/14/23	J.C. Schad	Attention to materials re discovery responses, analyze, notate, record documents for report, transmission to E. Kim (3.8); extract supporting	6.30



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Date	Timekeeper	Description	Hours
		materials for report to E. Kim re: LMI brokers, agents (1.6); discussions with E. Kim re: insurer reimbursement records, summaries and data (.90).	
08/14/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/14/23	A. Kramer	Review letter and attachment from T. Burns (.30); email exchange with RS and JD Teams re: same (.10).	0.40
08/14/23	T.P. Law	Begin review of discovery responses to LMI and Evanston.	0.80
08/15/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/15/23	E. Y. Kim	Calls with M. Hurst regarding payment of claims by LMI (.40); call with Network Adjusters regarding same (.20); calls with J. Schad regarding LMI policies (.70); revise responses to LMI interrogatories (1.6); revise responses to LMI document requests (1.1); revise responses to Evanston document requests (1.4); revise responses to Evanston interrogatories (1.8).	7.20
08/15/23	A. Kramer	Communications with E. Stephens re: expert issue (.20); review new 2004 notice (.20); email exchanges with RS and JD teams re: same (.20); email exchanges re: new Arrowood quarterly filing (.20).	0.80
08/15/23	T.P. Law	Review and comment to Jones Day on Unsecured Creditor's Committee 2004 motion.	0.50
08/15/23	T.P. Law	Forward Arrowood financials to Jones Day with email comments.	0.30
08/15/23	T.P. Law	Review and revise discovery responses to LMI and Evanston.	2.60



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Date	Timekeeper	Description	Hours
08/15/23	J.C. Schad	Analyze, prepare loss run reference materials for discussions with E. Kim re: LMI payment history, supporting materials (2.4); policy analysis, discussions with E. Kim re: secondary evidence for support of draft discovery responses (1.2).	3.60
08/16/23	E. Y. Kim	Draft and finalize joint letters for extension for LMI and Evanston discovery responses (1.5): call with J. Schad regarding Evanston policies and interrogatory responses (.30); revise responses to Evanston Interrogatories (2.3).	4.10
08/16/23	T.P. Law	Work in process call with client, Jones Day and Reed Smith teams.	1.20
08/16/23	T.P. Law	Telephone conference with client re: LMI and Evanston discovery responses.	0.50
08/16/23	T.P. Law	Follow up call with Jones Day re: insurance issues.	0.40
08/16/23	T.P. Law	DR letter to T. Burns, insurance counsel to the Committee re proposed Complaint and request not to settle.	1.60
08/16/23	T.P. Law	DR emails and correspondence re: extension of time to complete discovery responses.	0.80
08/16/23	T.P. Law	Begin drafting joint status letter to new judge assigned to LMI/Lexington case.	1.60
08/16/23	A. Kramer	Work in process call with Renker, JD and RS teams re: insurance issues re: Arrowood, LMI and Allianz, plan negotiations etc. (1.20); telephone call with T. Law re: plan negotiation issues (.20); teams call with JD team and T. Law re: committee insurance issues (1.60); review/comment on draft response to T. Burns (.10).	3.10
08/16/23	J.C. Schad	Record evidence re historic LMI coverage towers (3.5); review, analyze Evanston policy terms, evidence for suggested revisions to draft interrogatory responses (2.7); discussions with E. Kim re: LMI, Evanston, loss runs, insurer payments, discovery (.30).	6.50



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Date	Timekeeper	Description	Hours
08/17/23	T.P. Law	Complete draft of joint status letter to new judge assigned to LMI/Lexington case.	2.20
08/17/23	T.P. Law	Review term sheet and suggest edits.	0.30
08/17/23	L. E. Simmonds	Obtain filed letters to Magistrate Judge Cave.	0.50
08/17/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/18/23	A. Kramer	Review/revise draft term sheet (.50); telephone conversation (.10) and email exchange with A. Butler re: same (.10); zoom call with mediators re: settlement negotiations (2.50).	3.20
08/18/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/19/23	T.P. Law	Review insurance company changes to draft joint status letter to new judge assigned to LMI/Lexington case and make additional edits.	0.80
08/21/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
08/21/23	L. E. Simmonds	Analyze August 7, 2023 Order and Judge Subramanian Courtroom Policies and Procedures; edit, finalize and file letter to Judge Subramanian regarding current status of case.	1.00
08/21/23	T.P. Law	Review and finalize joint letter to Judge Subramanian.	0.90
08/22/23	A. Kramer	Review/revise draft response to 2004 demand (.20); email exchange with JD team re: same (.20); research/respond to C. Ball question re: policies (.10).	0.50
08/22/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and	0.80



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Date	Timekeeper	Description	Hours
		calendar.	
08/23/23	A. Kramer	Work in process call with JD and A&M teams with T. Law re: negotiations with committee, pending motions, upcoming hearings etc. (.90); review BurnsBair standing motion filed in Rochester case (.40); email exchange with JD & RS teams re: same (.10).	1.40
08/23/23	T.P. Law	Work in process call with Jones Day and Reed Smith teams.	0.90
08/23/23	C.M. LauKamg	Retrieve USBC WDNY Diocese of Rochester Committee Standing Motion and circulate same to Attorneys.	0.20
08/23/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/23/23	J.C. Schad	Review, calculate, analyze materials from TPAs, insurers, brokers, re: retention amounts, paid indemnity, remaining aggregate insurance.	1.40
08/24/23	J.B. Berringer	Review Chapin email re: Ecclesia issues (.50); email T. Law, Chapin re: same (.20); email W. Chapin re: reply to reinsurers (.30); email T. Law re: same (.10).	1.10
08/24/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/24/23	J.C. Schad	Discussion, communication with E. Kim re: documents for production to Arrowood (.20); review, notate, record documents from TPA, claims rep re: discovery responses (1.6).	1.80
08/25/23	E. Y. Kim	Call with T. Law, J. Berringer regarding [REDACTED] (.50); call with T. Law, J. Berringer, A. Kramer regarding same (.30); revise responses to Evanston interrogatories and analyze policies and relevant documents for same (3.4); revise responses to LMI	7.90



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Date	Timekeeper	Description	Hours
		interrogatories for J. Berringer review (1.5); revise responses to LMI document requests for same (.80); revise responses to Evanston document requests for same (1.4).	
08/25/23	A. Kramer	Review JD spreadsheets re: [REDACTED] (.20); conference call with RS Team re: same and allocation issues (.20).	0.40
08/25/23	T.P. Law	Telephone conference with J. Berringer and E. Kim re: [REDACTED].	0.50
08/25/23	T.P. Law	Follow up telephone conference with A. Kramer, J. Berringer, and E. Kim re: [REDACTED].	0.50
08/25/23	T.P. Law	Review and comment on the Committee changes to the Order to allow litigation funders access to claim information,	0.30
08/25/23	T.P. Law	Email N. Sochurek at KCIC re: [REDACTED].	0.30
08/25/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/25/23	J.B. Berringer	Telephone conference with T. Law, E. Kim re: discovery issues (.50); telephone conference with Law, Kim and Kramer re: [REDACTED] (.60); review mediator email re: UCC response to LMI offer (.20).	1.30
08/26/23	E. Y. Kim	Analyze LMI and Evanston policy documents responsive to LMI and Evanston's document requests for production.	3.80
08/27/23	J.C. Schad	Research for report to E. Kim re: non-cumulation provisions in the LMI policies (.40); prepare report with supporting materials (.20).	0.60
08/27/23	J.B. Berringer	Revisions to discovery replies to Evanston, LMI.	2.50
08/27/23	E. Y. Kim	Analyze documents from client responsive to LMI document requests for production (2.4); analyze Evanston and LMI policies for production (1.5); analyze Gallagher Bassett safety newsletters for production to LMI (.50).	4.40



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08/28/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/28/23	J.C. Schad	Attention to historic documents recovered from broker, perform comparative analysis re potential production to Arrowood in discovery (3.5); review, notate, record documents for production (1.3).	4.80
08/28/23	J.B. Berringer	Teleconference with E. Kim re: edits to discovery responses (1.4); review emails re: Ecclesia notice issues and email W. Chapin re: same (.40); review UCC motion re: bad faith complaint and emails to A. Kramer and T. Law re: same (.90).	2.70
08/28/23	E. Y. Kim	Call with J. Berringer regarding revisions to LMI and Evanston discovery responses (1.0); revise same per J. Berringer's comments (2.3); analyze LMI and Evanston policy documents for production (3.2).	6.50
08/28/23	A. Kramer	Review committee filing re: standing (.20); email exchange with Berringer and Law re: same (.20).	0.40
08/29/23	J.B. Berringer	Review W. Chapin email re: syndicate insolvency and email J. Schad re: same (.40); review Arrowood letter to DOB, reply to letter (.60); t/c KCIC re: [REDACTED] (.70); review, reply to W. Chapin email re: notice to reinsurers (.40); review motion by UCC, emails Kramer, Law, Ball re: same (1.2).	3.30
08/29/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/29/23	J.C. Schad	Review notice of settlement, analyze settlement terms, prepare report to J. Berringer and W. Chapin re: Syndicate participation during relevant period (.40); comparative analysis re: documents potentially responsive to Arrowood RFPs (6.3); correlate documents for submission to E. Kim re: potentially responsive documents (.80); prepare	7.70



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Date	Timekeeper	Description	Hours
		report to E. Kim re: potentially responsive documents (.20).	
08/29/23	E. Y. Kim	Analyze supplemental Royal policy documents from Porter & Curtis for production to Arrowood.	2.20
08/29/23	E. Y. Kim	Draft, revise joint letters for extensions for LMI and Evanston discovery responses (1.4); emails to opposing counsel regarding same (.30); analyze LMI and Evanston policy documents for production (2.9).	4.60
08/29/23	T.P. Law	Review correspondence from Arrowood to D. Artese re: response to subpoena and email D. Artese.	0.20
08/29/23	T.P. Law	Telephone conference with KCIC re: [REDACTED].	0.50
08/29/23	T.P. Law	Address extensions for discovery responses.	0.30
08/30/23	J.B. Berringer	Preparation for, attendance on team conf. call (.90); review of Camden decision (1.1); teleconference with A. Kramer, emails Davey, Adams re: [REDACTED] (.50); review, reply to Adams email re: same (.30); emails re: adjournment of UCC motion (.40).	3.20
08/30/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/30/23	C.M. LauKamg	Retrieve USBC NJ Diocese of Camden New Jersey docket for Memorandum Decision Denying Motion to Approve Settlement and circulate same to Attorneys.	0.20
08/30/23	E. Y. Kim	Analyze supplemental policy-related documents from Porter & Curtis related to LMI and Evanston for production (1.5); call with W. Chapin regarding responses to LMI document requests and Evanston interrogatories (.20); analyze LMI document requests and Evanston interrogatories to prepare for same (.50); revise LMI document requests per W. Chapin's comments (.30).	2.50



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Date	Timekeeper	Description	Hours
08/30/23	E. Y. Kim	Analyze supplemental Royal policy documents from Porter & Curtis for production to Arrowood (3.4); analyze responses to Arrowood's policy-related document requests (.40).	3.80
08/30/23	A. Kramer	Work in process call with Renker, JD, RS and A&M teams re: mediation, committee questions, motion for standing etc. (.90); review Camden opinions (2.70); review/analysis of KCIC defense allocation (.50); email exchange with T. Monteleone and B. Rosenblum re: same (.20).	4.30
08/31/23	J.B. Berringer	Review and respond to emails re: Camden decision (1.6); emails w/ T. Renker re: defense costs (.40); review email from B. Davey (.30); t/cs Davey, Kramer re: same (.40); draft email to Davey, Adams, t/c Kramer re: same (.50); email to Davey, Adams (.20); review, forward Evanston letter to Committee (.30); review email from Chambers (.10).	3.80
08/31/23	E. Y. Kim	Analyze supplemental policy-related documents from Porter & Curtis related to LMI and Evanston for production (1.8); revise responses to LMI document requests based on analysis of same and documents from client (.30).	2.10
08/31/23	E. Y. Kim	Analyze supplemental Royal policy documents from Porter & Curtis for production to Arrowood.	4.30
08/31/23	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
08/31/23	A. Kramer	Email exchange with JD and RS Teams re: Camden opinions etc.	0.80
Total Hours			281.20

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
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Timekeeper	Hours	Rate	Total
Ann V. Kramer	21.70 hrs @ \$	1,390.00 / hr	30,163.00
John B. Berringer	47.00 hrs @ \$	1,285.00 / hr	60,395.00
Timothy P. Law	43.10 hrs @ \$	1,250.00 / hr	53,875.00
Esther Y. Kim	92.40 hrs @ \$	685.00 / hr	63,294.00
James C. Schad	56.40 hrs @ \$	600.00 / hr	33,840.00
Christopher LauKamg	18.40 hrs @ \$	410.00 / hr	7,544.00
Lianna E. Simmonds	2.20 hrs @ \$	330.00 / hr	726.00
Total Professional Services			249,837.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
07/14/2023	T. Law Rail Expense to attend W. Chapin Deposition and Settlement Conference	311.00
07/16/2023	T. Law Lodging Expense to attend W. Chapin Deposition and Settlement Conference	231.99
08/10/2023	Amended and Supplemental Petition for Writ of Mandamus Filing Expense	150.00
08/25/2023	Gravity Stack LLC May 2023 Invoice	868.90
Total Expenses and Other Charges		1,561.89

INVOICE SUMMARY

Total Fees	\$ 249,837.00
Total Expenses and Other Charges	\$ 1,561.89
TOTAL CURRENT INVOICE DUE	\$ 251,398.89
Total Amount Due	\$ 251,398.89



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3653095**
Invoice Date: **9/20/2023**
Client Number: **504893**
Matter Number: **504893.60006**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Fee statements/fee applications

Total Current Fees.....\$ 4,625.50

Total Due This Invoice: \$ 4,625.50

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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RE: Fee statements/fee applications

INVOICE SUMMARY

Total Current Fees.....	\$ 4,625.50
Total Due This Invoice:	\$ 4,625.50

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Number: **3653095**
Invoice Date: **9/20/2023**
Client Number: **504893**
Matter Number: **504893.60006**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2023

Date	Timekeeper	Description	Hours
08/07/23	C.M. LauKamg	Prepare, review and edit USBC SDNY Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	1.00
08/08/23	C.M. LauKamg	Finalize USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Third Monthly Fee Statement in preparation for electronic filing.	0.40
08/09/23	C.M. LauKamg	Review and revise USBC SDNY Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	1.00
08/10/23	C.M. LauKamg	Work with Accounting Department to finalize USBC SDNY Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	0.60
08/11/23	C.M. LauKamg	Coordinate with Accounting Department regarding revisions to Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	0.80
08/11/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	1.00
08/11/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Certificate of No Objection for the June 2023 Reed Smith LLP Monthly Fee Statement and update master files and calendar.	0.80
08/11/23	C.M. LauKamg	Finalize USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Third Monthly Fee Statement in preparation for electronic filing.	0.20



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Date	Timekeeper	Description	Hours
08/14/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	0.60
08/15/23	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty Fourth Monthly Fee Statement in preparation for electronic filing.	0.80
08/17/23	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Reed Smith LLP Thirty Fourth Monthly Fee Statement and update master files and calendar.	1.80
08/17/23	A. Javian	Final review/comment of monthly statement.	0.50
08/30/23	C.M. LauKamg	Arrange USBC SDNY A. Javian September 6, 2023 Fee Hearing Appearance and circulate confirmation of same.	0.40
08/31/23	C.M. LauKamg	Finalize USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Fourth Monthly Fee Statement in preparation for electronic filing.	0.40
Total Hours			10.30

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Aaron Javian	0.50 hrs @ \$	1,215.00 / hr	607.50
Christopher LauKamg	9.80 hrs @ \$	410.00 / hr	4,018.00
Total Professional Services			4,625.50

INVOICE SUMMARY

Total Fees	\$ 4,625.50
TOTAL CURRENT INVOICE DUE	\$ 4,625.50
Total Amount Due	\$ 4,625.50